

Exhibit B

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JARROD STRINGER, et al.

Plaintiffs,

v.

RUTH HUGHS, in her official capacity as Texas
Secretary of State and STEVEN C. MCCRAW, in
his official capacity as Director of the Texas
Department of Public Safety

Defendants.

Civil Action Case No. 5:20-cv-00046-
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**DECLARATION OF ALEXANDER EDELMAN IN SUPPORT OF PLAINTIFFS’
MOTION FOR A PRELIMINARY INJUNCTION**

Pursuant to 20 U.S.C. § 1746 I, Alexander Edelman, testify that:

1. I am over the age of 18, have personal knowledge of the facts below, and can competently testify to their truth.
2. I currently serve as the National Field Director for DCCC, also known as the Democratic Congressional Campaign Committee. I have held this position since February 2019.
3. The mission of DCCC is to elect Democratic candidates to the U.S. House of Representatives. DCCC works to accomplish this mission by, among other things, funding voter registration drives to register new voters who may support and vote for Democratic candidates across the country.
4. For the 2020 election cycle, DCCC has identified at least eight congressional districts in Texas (Congressional Districts 2, 7, 10, 21, 22, 23, 24, 31, and 32) as targeted races, in which it will expend resources to support the Democratic candidate
5. As the National Field Director, I am responsible for the planning and execution of DCCC’s National Field Program, which includes the supervision of field staff in congressional

districts where DCCC is actively working to elect Democratic candidates to the U.S. House of Representatives. DCCC plans to spend even more on voter activities in Texas for the 2020 election, including on GOTV, voter education, and voter registration.

6. DCCC has already invested hundreds of thousands of dollars dedicated to specifically registering voters in Texas. DCCC recently spent nearly \$400,000 to compensate a consultant, Sisneros Strategies, for providing voter registration services in Texas Congressional District 23. This is a specific example of one of many voter registration expenditures DCCC expects to incur to register voters in Texas for the 2020 election.

7. DCCC plans to ultimately invest millions of dollars into registering and mobilizing voters in Texas in advance of the 2020 election. DCCC uses voter registration not only to expand the pool of individuals who are eligible to vote for Democratic candidates, but also to have important conversations with people about the importance of voting and about important causes to the Democratic Party.

8. DCCC supports and participates in what is commonly referred to as the “coordinated campaign,” in which it works collaboratively with the state party committee and other national Democratic committees to elect Democrats up and down the ticket within the state. In advance of the 2020 general election, DCCC intends to give significant sums to the Texas Democratic Party to spend on its field program, which will necessarily involve, among many things, voter registration efforts, to help elect Democratic candidates from Texas to national office. DCCC has already transferred over \$145,000 to the Texas Democratic Party this election cycle to support its registration efforts.

9. In fact, the Texas Democratic Party recently announced plans to launch the largest voter registration effort in the state’s history. *See* Exhibit A. DCCC plans to actively support this effort financially and with staffing resources.

10. Defendants’ continued refusal to follow federal and constitutional law by not allowing for automatic voter registration with online transactions makes DCCC’s work in Texas significantly more costly. DCCC is aware of Defendants’ continued violations and believes it must

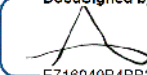
register and turn out additional voters to account for voters who mistakenly believe they have updated their registration and as a result are unable to vote, as happened to the original plaintiffs in this action.

11. In particular, Defendants' conduct forces DCCC to spend additional resources in Texas on get out the vote ("GOTV") and voter persuasion efforts, diverting those funds from other mission-critical efforts nationwide. DCCC has concentrated its limited resources on efforts in various battleground states, with remaining resources going toward non-battleground states. But now, DCCC must divert resources—including funds, personnel, and time—from GOTV, voter education, and voter registration efforts in other states, including important battleground states, to compensate for the issues caused by Defendants' conduct.

12. Not only is DCCC diverting resources—including funds, personnel, and time—from its activities in other states, but it is forced to divert resources within Texas. For example, DCCC may have to divert resources from directly making contributions to campaigns in Texas to funding voter education and registration efforts in order to combat the effects of Texas' refusal to offer simultaneous voter registration to individuals who update their driver's license information online.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 14, 2020.

DocuSigned by:

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Alexander Edelman
National Field Director
DCCC